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United States District Court  
For The  
Middle District of Pennsylvania

Randy Alan StARNER

No: 01-CV-757

V.

FILED  
HARRISBURG

OCT 10 2001

MARY E. D'ANDREA, CLERK  
Per WLS  
DEPUTY CLERK

Affidavit

(William W. Caldwell)

J.

Michael O. Daniels, M.D., et al.

(Title 42 U.S.C.A. § 1983.)

I Randy Alan StARNER, hereby  
declare: that I am able to produce credit-  
able witnesses to give testimony as to  
the following events and discussion.

Said subpoenas are on file, with Clerk of Courts, to be issued at the appropriate time.

The identity of these witnesses is known to the court. I will not name them at this time, to protect them from any reprisals, unless ordered to do so from the court.

This affidavit is to inform Defense Counsel of record that plaintiff intends to subpoena witnesses.

1.) Events and Discussion that took place; January 22, 2001, at the BELVEDERE Medical Center, DR. CRAIG J. JURGENSEN, Neurologist.

2.) Events and Discussions that took place between; December 4, 2000 to March 24, 2001. Place: Cumberland County Prison, Medical Department. "DR. DANIELS; DR. WOODS."

I Randy Alan Starner, have spoken with all witnesses. Said witnesses and myself have agreed that, as not to jeopardize their livelihood, they shall only give testimony under subpoena.

I verify that the statements made  
in this affidavit are true and correct.

I understand that false statements herein  
are made subject to the penalties of,  
18 Pa. C.S. 4904, relating to unsworn falsi-  
fication to authorities.

October 4th 2001  
Date

Randy Ann Stener  
Signature

United States District Court  
For The  
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V.

(William W. Caldwell  
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Michael O. Daniels, M.D., et al.

Certificate of Service

I hereby certify that service of a true and correct copy of the enclosed, Affidavit, was sent to counsel of record this 4th day of October, 2001 by first class mail.

Andrea L. Bennett  
Devlin & Devine  
100 W. Elm Street  
Conshohocken, Pa. 19428

Foulkrod Ellis  
Professional Corporation  
1800 Linglestown Road, Suite-305  
Harrisburg, Pa. 17110

By: Randy Alan StARNER